

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: JUUL LABS, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

This Document Relates to:

*Cheyenne and Arapaho Tribes of Oklahoma
v. Juul Labs, Inc. et al.*, Case No. 3:21-cv-
05134.

*Fond Du Lac Band of Lake Superior
Chippewa v. Juul Labs, Inc., et al.*, Case No.
3:20-cv-03995

Klamath Tribes v. Juul Labs, Inc., et al., Case
No. 3:20-cv-03987

Case No. 19-md-02913-WHO

**STIPULATION AND [PROPOSED]
ORDER TO AMEND TRIBAL CASE
SCHEDULE**

Judge: Hon. William H. Orrick

The parties jointly stipulate and agree, subject to the Court's approval, to amend certain deadlines applicable in the above-captioned cases.

WHEREAS, at the Case Management Conference on May 6, 2024, the Court stated that it would grant the parties' request to modify pretrial deadlines in the Tribal bellwether litigation as set forth in the parties' Joint Case Management Statement. *See* Dkt. No. 4220 (outlining the parties' proposed amended schedule).

WHEREAS, following the May 6, 2024 case Management Conference, the parties met and conferred further and, in order to accommodate the schedules of the parties and subject to the Court's approval, jointly propose the following revised schedule for the deadlines below:

Event	Current Deadline (Dkt. No. 4220)	Proposed Deadline
Depositions of Defendants' Experts ¹	June 17, 2024	August 16, 2024
Deadline to file Summary Judgment and <i>Daubert</i> Motions	July 16, 2024	September 14, 2024
Deadline to file Oppositions to Summary Judgment and <i>Daubert</i> Motions	September 13, 2024	November 12, 2024
Deadline to file Replies in support of Summary Judgment and <i>Daubert</i> Motions	October 17, 2024	December 16, 2024

THEREFORE, the parties therefore respectfully request that the Court enter an Order establishing the above deadlines.

¹ Plaintiffs reserve their right to seek submission of rebuttal expert reports following submission of Defendants' expert reports and deposition of Defendants' experts. Defendants dispute that rebuttal expert reports would be appropriate, and reserve all rights to contest any attempt by Plaintiffs to seek their submission.

1 Dated: May 16, 2024

Respectfully submitted,

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LLC, Altria Group Distribution Company,
and Altria Enterprises LLC*

CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2024, I electronically filed the foregoing document and all attachments thereto with the Clerk of the Court using the CM/ECF system, which will automatically send notification of filing to all counsel of record.

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